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9 SYNCHRONY BANK

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 MARCHE SINGH,

13 Plaintiff,

14 vs.

15 SYNCHRONY BANK,

16 Defendant.

Case No. 3:16-CV-05740-WHO

**JOINT STIPULATION TO  
ARBITRATE CLAIMS AND  
DISMISS LAWSUIT**

[Hon. William Orrick Jr.]

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18 Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Marche Singh (“Singh”) and Defendant Synchrony Bank (“Synchrony”) (collectively, “the Parties”), by and through their respective undersigned counsel, hereby submit this Joint Stipulation to Arbitrate Claims and Dismiss Lawsuit, stating as follows:

23 1. The Parties have now agreed to submit all of the claims in this lawsuit to  
24 arbitration pursuant to the Parties’ arbitration agreements, which are included in the  
25 cardmember agreements (the “Agreements”) affecting Singh’s credit card accounts  
26 with Synchrony.

27 2. The Parties therefore respectfully request that (a) this Court order that all  
28 of the claims in this lawsuit be submitted to binding, non-judicial arbitration pursuant

1 to the Parties' arbitration agreement, and (b) that the case be dismissed without  
2 prejudice.

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4 DATED: April 17, 2018

REED SMITH LLP

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6 By /s/ Raagini Shah<sup>1</sup>  
7 Raagini Shah  
8 Attorney for Defendant  
9 SYNCHRONY BANK

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11 DATED: April 17, 2018

KIMMEL & SILVERMAN, P.C.

12 By /s/ Rachel Rebecca Stevens  
13 Rachel Rebecca Stevens  
14 Attorney for Plaintiff  
15 MARCHE SINGH

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27 <sup>1</sup> Pursuant to Northern District Local Rule 5-1(i)(3), filing counsel attests that all other  
28 signatories listed, and on whose behalf this filing is submitted, concur in the filing's  
content and have authorized the filing.